Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Federally-Enforceable permit No. F-06-008 Revision 2
AMAK BRAKE, L.L.C
GLASGOW, KENTUCKY
April 23, 2008
RITA ARGUELLO
AFS Plant I.D. 21-009-00067
AI# 15685, APE# 20080001

SOURCE DESCRIPTION:

AMAK BRAKE LLC consists of three manufacturing departments. These departments are the Friction Department, Caliper Department and the Aftermarket Friction Department. The Friction Department and the Aftermarket Friction Department produces asbestos free brake pads and the Caliper Department assemblies brake calipers.

REVISION 2:

AMAK BRAKE LLC has expanded its operations in Glasgow, KY in order to accommodate the transfer of equipment associated with a sister plant located in Springfield, KY, Permit F-06-027, at the Glasgow facility.

The following equipment was added by transferring from Permit F-06-027 to this permit:
Section B: Surface Treatment Adhesive Booth, 1 Mixing & Blending System and 2 Aftermarket Friction Lines Grinders.
Section C: 2- Air Make-up Units(2 – 2.93 mmbtu/hr), 1 Surface Treatment Cure Oven (1.0 mmbtu/hr), 2 Powder Paint Marking/Painting Lines (closed loop system), 2 - Aftermarket Line 1 Cure Ovens (.795029 mmbtu/hr, .317329 mmbtu/hr), 2 – Aftermarket Line 2 Cure Ovens (2 - .795029 mmbtu/hr), 2- Natural Gas Boilers (2 – 4.5 mmbtu/hr), Hot Pressing Operations and 1 Fine Blanking Unit. A Slitter/Grinder (2007) which was added will replace the Slitter/Grinders associated with AM1 (Permit F-06-027, EP 06,07,08.); on Off-Permit of 2/28/2007.

The following equipment was removed from the existing permit:
Section C: a double Line Scorching unit (0.441 mmbtu/hr)

New addition to this permit:
Section C: a Fine Blanking unit.
Emission Limitation: Standard limit has been modified from 25 tons per year to 22.5 tons per year of HAPs total.
Regulation: 401 KAR 63:020 has been added for Toluene and HCl. Monitoring requirement has been changed.
An SCREEN3 modeling run for Toluene (a hazardous air pollutant) showed ambient concentrations, even without controls, would be below levels that would create risk for the exposed populace. See Attachment.

This facility still takes the limits to be a conditional major (area source) but operating limitations, standards limitation, monitoring and recordkeeping requirements have been changed, this is a significant revision pursuant to 401 KAR 52:030, Section 16.

REVISION 1:

Amak Brake LLC has added a new line, that was moved from the sister plant located in Springfield,

KY. The manufacturing line will include the following equipment:

Section B: 2 - Grinders, 1- Mixing and blending system.

Section C: 1 - Powder Paint Marking/Painting Lines (closed loop system), 4 - Aftercure Oven (1.2 mmBTU/hr each), 1- OE 51 Fibermatte Scorcher (4.7616 mmBTU/hr), 1- OE 52 Fibermatt Scorcher (4.7616 mmBTU/hr), 1 – Double Lane Scorcher (0.441 mmBTU/hr)

Section H: The proposed modification stated in section H of the permit was completed in July 2006; hence, 2 new grinders (EP04) have been removed from section H to Section B.

Since the facility still takes the limits to be a conditional major (area source) and no monitoring and recordkeeping requirements have been changed, this revision is minor revision pursuant to 401 KAR 52:030, Section 14.

INITIAL:

COMMENTS:

Amak Brake LLC has applied for an initial conditional major permit, which this facility originally possessed a Title V permit (V-00-032) and it was revised on December 10, 2001. During the period of renewing their Title V permit (V-00-032), the facility wanted to take federal enforceable limits to become non-major source since MEK has been delisted as a HAP. By becoming a non-major source, this facility is exempted from 401 KAR 59:225: New miscellaneous metal parts and products surface coating operations, and 40 CFR 63 Subpart MMMM: National emission standards for hazardous air pollutants for surface coating of miscellaneous metal parts and products. This facility has also removed four wet marking and painting lines (Powder painting has replaced wet painting) and an open top vapor degreaser with Trichloroethylene.

Amak Brake has proposed to replace 4 grinders [EP04] with 2 new grinders in two phases. One new grinder will replace two old grinders in March 2006; another new grinder will replace the other two old grinders in April 2006. This two-phase grinder replacement will not cause any emission increase. Section H, Alternative Operating Scenarios, includes all alternatives caused by
this two-phase grinder replacement.

Amak Brake requests emission limitation to restrict the plantwide VOC emission rates to be less than 90 tons per year. Also to preclude Title V applicability, the emissions of combined hazardous air pollutants shall not exceed 22.5 tons per year, the emissions of an individual hazardous air pollutants shall not exceed 9.0 tons per year, and the plantwide particulate emission rates are limited to less than 90 tons per year. Therefore, 401 KAR 52:030, Federally-enforceable permits for non-major sources, is applicable for the source.

EMISSION AND OPERATING CAPS DESCRIPTION:

1. Volatile organic compound (VOC) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.

2. Hazardous air pollutants (HAPs) emissions shall not exceed 9 tons per year individually and 22.5 tons per year combined based on a rolling 12 month total for the entire source to

   preclude a major source Title V review.

3. Particulate matter (PM/PM10) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

Attachment

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***  SCREEN3 MODEL RUN  ***
  *** VERSION DATED 96043 ***

 AMAK Toluene

 SIMPLE TERRAIN INPUTS:
    SOURCE TYPE            =        POINT
    EMISSION RATE (G/S)    =      .198500
    STACK HEIGHT (M)       =      14.9352
    STK INSIDE DIAM (M)    =        .3048
    STK EXIT VELOCITY (M/S)=      22.9300
    STK GAS EXIT TEMP (K)  =     322.0000
    AMBIENT AIR TEMP (K)   =     293.0000
    RECEPTOR HEIGHT (M)    =       1.0000
    URBAN/RURAL OPTION     =        RURAL
    BUILDING HEIGHT (M)    =        .0000
    MIN HORIZ BLDG DIM (M) =        .0000
    MAX HORIZ BLDG DIM (M) =        .0000

 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.


 BUOY. FLUX =     .470 M**4/S**3;  MOM. FLUX =   11.112 M**4/S**2.

 *** FULL METEOROLOGY ***

 **********************************
 *** SCREEN AUTOMATED DISTANCES ***
 **********************************

 *** TERRAIN HEIGHT OF    0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES
***

   DIST     CONC              U10M   USTK  MIX HT   PLUME   SIGMA   SIGMA
    (M)   (UG/M**3)   STAB  (M/S)  (M/S)    (M)   HT (M)   Y (M)   Z (M)
DWASH
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-
     10.   .3349E-12    1     1.0    1.0   320.0   35.32    5.01    4.04    NO
    100.   17.07        1     2.5    2.6   800.0   23.09   26.95   14.14    NO
    200.   20.98        2     1.5    1.5   480.0   28.53   36.37   20.60    NO
    300.   22.17        3     1.5    1.6   480.0   28.36   34.51   20.69    NO
    400.   21.52        3     1.0    1.0   320.0   35.08   45.02   27.06    NO
    500.   18.98        3     1.0    1.0   320.0   35.08   55.07   32.94    NO

 MAXIMUM 1-HR CONCENTRATION AT OR BEYOND    10. M:
    287.   22.24        3     1.5    1.6   480.0   28.36   33.25   19.95    NO

  DWASH=   MEANS NO CALC MADE (CONC = 0.0)
  DWASH=NO MEANS NO BUILDING DOWNWASH USED
  DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
  DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
  DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

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      *** SUMMARY OF SCREEN MODEL RESULTS ***
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  CALCULATION        MAX CONC    DIST TO   TERRAIN
   PROCEDURE        (UG/M**3)    MAX (M)    HT (M)
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 SIMPLE TERRAIN      22.24          287.        0.
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